

3. In addition, other defendants in this matter have received Notices of a Lawsuit dated August 29, 2022, along with a proposed Waivers of Service of Summons, pursuant to Rule 4(d) of the Federal Rules of Civil Procedure. Undersigned counsel executed Waivers on behalf of their respective clients, making responsive pleadings due, under Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, on October 28, 2022.

4. Given the length of the Complaint and the complexity of the task of responding, there is good cause for this extension to allow counsel and their clients to adequately respond. Further, by setting one deadline, the tracking of responsive pleading deadlines will be simplified for all parties and the Court.

5. This extension will not unduly delay this proceeding or unduly prejudice any party to this case.

6. Pursuant to Local Rule 7.1(a)(2), given the nature of the relief sought and Plaintiff's assent, no memorandum of law is submitted in support of this Motion.

7. Pursuant to Local Rule 7.1(c), undersigned counsel spoke with Plaintiff's counsel, who expressed assent to the relief requested by this Motion.

WHEREFORE, Defendants respectfully request that the Court:

- A. Grant this Motion;
- B. Extend the deadline for responsive pleadings to November 18, 2022; and
- C. Issue any further relief the Court deems just and proper.

Respectfully submitted,

**JAMES DONCHESS, MAYOR OF THE
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Dated: 9/21/22

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served through the Court's
CM/ECF system.

Dated: 9/21/22

/s/ Adam B. Pignatelli

Adam B. Pignatelli